

REMARKS

Claims 1-4 are currently pending in the application. By this amendment, claims 1-3 are amended and claim 4 is added for the Examiner's consideration. The above amendments and added claim 4 do not add new matter to the application and are fully supported by the specification. For example, support for the amendments and subject matter of claim 4 is provided at Figure 4, and the original claims. Reconsideration of the rejected claims in view of the above amendments and the following remarks is respectfully requested.

Objection to Claims

Claim 3 was objected to based on an informality. Claim 3 is amended in accordance with the Examiner's helpful instructions. The objection to claim 3 should now be withdrawn.

35 U.S.C. §112 Rejection

Claim 2 was rejected under 35 U.S.C. §112, 1st paragraph as being directed to a single means claim. This rejection is respectfully traversed.

Applicants respectfully submit that claim 2, as originally presented, was not a single means claims. Specifically, claim 2, as originally presented, included reference to all of the method steps of claim 1, and accordingly, was a multiple means claims. However, in order to expedite the examination of the application, claim 2 is amended to recite method steps of claim 1, in "means plus function" terminology.

Applicants submit that the amendment to claim 2 is not a narrowing amendment or an amendment made for reasons of patentability. Claim 2 is amended for formalities, and should not be construed otherwise. Applicants' position is that claim 2 was proper, as it was originally presented.

Accordingly, Applicants respectfully request that the rejection over claim 2 be withdrawn.

35 U.S.C. §103 Rejection

Claim 1-3 were rejected under 35 U.S.C. §103(a) over EP 569133A2 to Anderson et al. This rejection is respectfully traversed.

In rejecting the claimed invention, the Examiner is of the opinion that Anderson shows all of the features of the claimed invention, except the working buffer. Although Applicants agree that Anderson does not show the working buffer, it is Applicants further opinion that many of the remaining features of claim 1 are not shown in the Anderson system. In fact, since Anderson does not suggest a working buffer, it would not be possible for Anderson to show many of the remaining features of the claimed invention such as, for example:

- (i) for each cell stored in the working buffer, if the content of the stored cell comprises one or a plurality of absolute references pointing to a cell or a cell range belonging to the source cell range:
 - a. determining for each of said cells or cell ranges pointed by an absolute reference and belonging to the source cell range, a relative position within the source cell range;
 - b. determining for each of said relative position within the source cell range, a corresponding absolute reference within the destination cell range;
 - c. replacing within the stored cell, each absolute reference pointing to a cell or a cell range belonging to the source cell range by the corresponding absolute reference within the destination cell range.

Anderson also does not show clearing the content of each cell that belongs to a source cell range to cut.

First, it would appear that the commonality between the claimed invention and that of Anderson is the use of absolute and relative references, which by themselves are well known in the art. But, this is where the commonality ends. In Anderson, model copying is used to copy

absolute references. But, this modeling technique does not discuss any of the features of the claimed invention. In model copying, as disclosed by Anderson, an absolute reference adjusts to the new location of the referenced cell (see, FIG. 4J). The absolute references remain absolute to make future copies absolute. So, should the user make more copies of the formula, the reference to a cell, e.g., cell B6, is still absolute. However, Anderson simply does not discuss or even remotely suggest the steps of the presently claimed invention, as recited above. To conclude otherwise would not be supported in the Anderson reference, and would appear to be impermissible hindsight reasoning based on Applicants' own disclosure.

In fact, Figure 9C, as reproduced below, defines model copying. As seen in Figure 9C, the absolute address is equated to a relative address (946). The relative address is labeled as absolute for future reference. The block is then moved, at step 947.

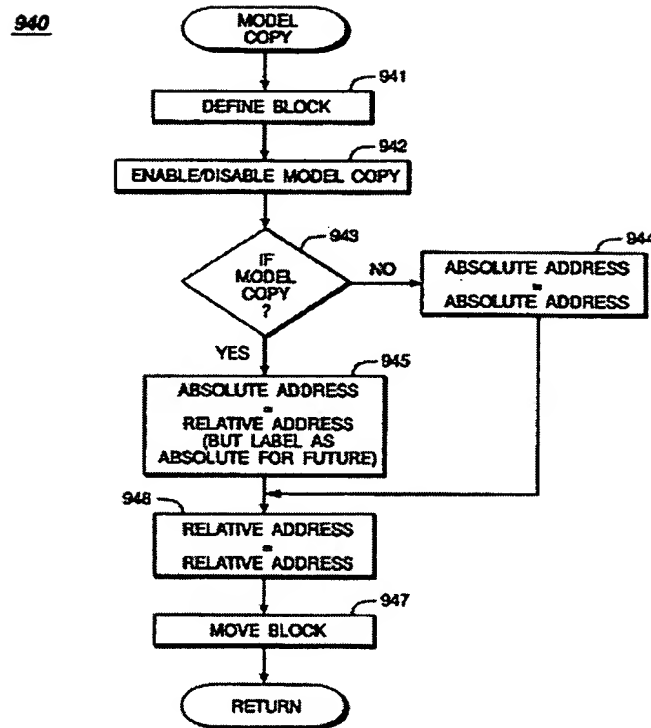


FIG. 9C

But, there simply is no disclosure or suggestion that the content of each cell that belongs to a source cell range to cut is cleared. Nor is there any disclosure or suggestion that, even if there was a working buffer, if the content of the stored cell comprises absolute references pointing to a cell or a cell range belonging to the source cell range determining (i) for each of said cells or cell ranges pointed by an absolute reference and belonging to the source cell range, a relative position within the source cell range; (ii) for each of said relative position within the source cell range, a corresponding absolute reference within the destination cell range; or (iii) replacing within the stored cell, each absolute reference pointing to a cell or a cell range belonging to the source cell range by the corresponding absolute reference within the destination cell range.

Applicants further submit that even assuming *arguendo* that Anderson shows a working buffer, there is still no suggestion that the same or similar approach would be used with Anderson as recited in the claimed invention. It would appear that if a working buffer were used in Anderson, only a simple cut and paste, already known to those of skill in the art, would be used with such a buffer. For example, in the context of Anderson, the absolute value would be written to and then copied from the buffer. But, to assume that other features as recited in the claimed invention would be performed, does not seem to be supported by Anderson or other known references. Applicants would thus respectfully submit that the Examiner provide a reference to show the remaining features of the claimed invention, in order to set forth a prima facie case of obviousness.

For the above reasons, Applicants request withdrawal of the rejection of claims 1-3.

Added Claim

Applicants add claim 4 for the Examiner's further review. Applicants are of the opinion that claim 4 contains allowable subject matter and is also distinguishable over the Anderson reference. For example, Anderson does not show parsing a memory.

CONCLUSION

In view of the foregoing amendments and remarks, Applicants submits that all of the claims are patentably distinct from the prior art of record and are in condition for allowance. The Examiner is respectfully requested to pass the above application to issue. The Examiner is invited to contact the undersigned at the telephone number listed below, if needed. Please charge any deficiencies in fees and credit any overpayment of fees to Deposit Account No. 09-0457.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Andrew M. Calderon', with a stylized flourish at the end.

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